

August 8, 2025

**VIA ECF**

Hon. Victoria Reznik  
 United States Magistrate Judge  
 United States District Court for the Southern District of New York  
 300 Quarropas Street  
 White Plains, NY 10601

Re: *Graham et al v. Vassar College*, No. 7:23-cv-07692

Dear Judge Reznik:

The parties submit this joint status letter pursuant to the Court's Order, dated July 14, 2025 (ECF No. 78).

**Potential Mediation.** As noted in the parties' last joint status letter, the parties have restarted discussions related to settlement. The parties are considering a mediation date of September 25 or 26. The parties are in the process of coming to a final agreement regarding proceeding with mediation.

**Discovery.** The parties will continue to work collaboratively to advance discovery in tandem with their discussions regarding potential mediation to avoid delay.

**Proposed Revised Schedule.** As requested by the parties in the last joint status letter (ECF No. 77), and granted by Your Honor (ECF No. 78), the parties seek modification of the current scheduling order (ECF No. 62) to provide that briefing on Plaintiffs' motion for class certification commence within six months of the parties' agreed upon deadline for substantial completion of their document productions. Consistent with that request, the parties propose the following revisions to the case schedule:

Event	Deadline
Substantial completion of parties' document productions	December 18, 2025
Plaintiffs' Motion for Class Certification, together with any class expert reports	June 18, 2026
Defendant's Opposition to Class Certification, together with any class expert reports	August 20, 2026
Plaintiffs' Reply in Support of Class Certification, together with any rebuttal expert reports	October 22, 2026

The parties propose that all other dates in the scheduling order remain unchanged.

Respectfully submitted,

SEYFARTH SHAW LLP

LIEFF CABRASER HEIMANN &  
BERNSTEIN, LLP

/s/ Maria Papasevastos

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/s/ Michelle A. Lamy

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